Glenn Springs Holdings, Inc.
A subsidiary of Occidental Petroleum

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David Garrett
Environmental Scientist
RCRA Corrective Action & Permits Branch
Air & Waste Management Division
US EPA Region 7
901 N. 5th Street
Kansas City, KS 66101

RE: Interim Corrective Measures Implementation Report
Asbestos Surface Impoundment-Solid Waste Management Unit
Occidental Chemical Corporation, 6200 S. Ridge Road, Wichita, Kansas
RCRA ID #KSD007482029.

Dear Mr. Garrett:

Glenn Springs Holdings, Inc. (GSHI) is providing the US Environmental Protection Agency (EPA) with this cover letter and attached report in response to the EPA comments letter received on 10 June 2008 regarding the Interim Corrective Measures Implementation Report submittted to the EPA on 16 April 2008. This letter provides responses to the EPA general and specific comments. Additional information is provided in the attached revised Interim Corrective Measures Implementation Report.

General Comments

1. **Comment**: *The Interim Corrective Measures Implementation Report (report) supersedes OCC's January 24, 2008, Asbestos Solid Waste Management Unit Closure Document. This report or its cover letter must be revised to clarify the succession.*

   Response: GSHI confirms that the attached Interim Corrective Measures Implementation Report (ICM Implementation Report) dated 14 July 2008 supersedes previous Occidential Chemical Corporation (OCC) reports regarding the Asbestos Surface Impoundment-Solid Waste Management Unit, including the referenced January 24, 2008, Asbestos Solid Waste Management Unit Closure Document.

2. **Comment**: *Based on information provided by OCC and the Glenn Springs Holding Company during the April 2008 facility visit, the extent of the asbestos surface impoundment will be determined during the onsite RCRA facility investigation (RFI). This report or its cover letter must be revised to note the additional work planned at the asbestos surface impoundment.*

   Response: GSHI confirms that additional work for the Asbestos Surface Impoundment-Solid Waste Management Unit will be specified in a future work plan for the Inorganic Area, as referenced within the draft RFI schedule. The work plan will be consistent with the most recent version of the EPA document entitled, RCRA Interim Facility Investigation Guidance; EPA 530/SW-89-031, OSWER Directive 9502.00-6D.

Specific Comments

1. **Comment: Section 2, Page 2-1, Paragraph 1; and Figures 2-1 and 2-2**. *Figures 2-1 and 2-2 show the estimated size and approximate location of the asbestos surface impoundment; however, Section 2 does not provide a basis for the estimate and approximation. The report should be revised to include historic photographs, drawings, or other documentation used to determine the estimated size and approximate location of the asbestos surface impoundment.*

   Response: The size and approximate location of the ASI was determined primarily from a 1961 aerial photograph, provided in Figure 2-3 of the ICM Implementation Report. Section 2 of the ICM Implementation Report includes additional background of past process that resulted in handling of asbestos-containing material within the surface impoundment visible in Figure 2-3.

2. **Comment: Section 2, Page 2-1, Paragraph 3; Figure 2-2; and Table 2-1**. *Figure 2-2 and Table 2-1 present the respective locations and analytical results for the grab samples described in Section 2. However, because common sample identifiers are missing from Figure 2-2, Table 2-1, and Section 2, the reader cannot link the grab samples described to their respective locations and analytical results. Common sample identifiers must be provided for Figure 2-2, Table 2-1, and Section 2.*

   Response: The specific samples' respective locations are unknown due to the lack of detailed field documentation. As a result, Figure 2-2, Table 2-1, and Section 2 have no common sample identifiers, however the text and figure now specify that the locations shown are referenced within Table 2-1 as W17-05 and W18-05. A legend note has been added to Figure 2-2, and Section 2 has been revised to clarify that OCC can not specifically correlate the Table 2-1 Sample IDs to approximate sample locations.

3. **Comment: Section 2, Page 2-1, Paragraph 3; and Figure 2-2.** *Section 2 describes a sample collected from a stockpile of excavated material. Figure 2-2 does not show the stockpile and sample location and must be revised to include it.*

   Response: The stockpile referenced within Section 2 is reference to a small quantity of loose soil that was initially moved by the skid loader during maintenance activities, which then led to the initial visual observation of potential asbestos-containing material. One sample (W16-05) was collected from this material somewhere east of the #4 Cooling Tower, although neither the approximate nor exact location is known. Section 2 has been revised to clarify the nature of the excavated material initially scraped and previously referenced as a stockpile, and a legend note has been added to Figure 2-2 explaining the lack of location marker for Sample W16-05.

4. **Comment**: **Section 2, Page 2-1, Paragraphs 3 and 4; and Table 2-1.** *Section 2 and Table 2-1 indicate that a sample of stockpiled excavated material contained between 15 and 75 percent chrysotile asbestos. Where the excavated material was disposed is unclear, and the report must be revised to include this information.*

   Response: As indicated in Response to Comment 3, the sample was collected from a small quantity of loose soil moved by a skid loader during initiation of maintenance re-grading in the area. No additional material was stockpiled or subsequently disposed. Material from the area just east of the #4 Cooling Tower was left in place and covered with a tarp until the area was covered with a concrete cap as described in Section 3. Additional text clarifying the project background is provided in Section 2.

Please do not hesitate to contact me if you have any questions or comments.

Sincerely,

Juan P. Somoano

Juan P. Somoano
Director, Operations

Cc: Devin Pollock, KDHE
Lisa Thurman, OCC